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Attorney for: Ford Motor Credit Company LLC, servicer for CAB  
EAST LLC

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:	)	
	)	Case No. 19-23618(CMG)
AMANDA KAROLEWICZ	)	
	)	Chapter 13
DARREN KAROLEWICZ	)	
	)	Hearing date: 9-4-19
	)	
	)	
	)	OBJECTION TO CONFIRMATION
	)	
	)	

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Ford Motor Credit Company LLC, servicer for CAB EAST LLC,  
the lessor of a 2016 Ford Taurus to the debtor, objects to  
the debtors' plan for the following reasons:

a. The debtor must assume the lease and pay all lease  
payments directly to Ford Motor Credit Company LLC in  
accordance with the terms of the lease and must either  
immediately purchase the vehicle or surrender it at lease  
end, and the plan must so provide.

b. The vehicle must be insured with comprehensive and  
collision insurance coverage and liability coverage in  
accordance with the requirements contained in the lease.

- c. Prepetition lease arrears must be cured promptly and paid to Ford Motor Credit Company LLC concurrently with or prior to payment of counsel fees, and in all events, prepetition arrears must be paid within 6 months of filing, OR before the lease terminates, whichever occurs first.
- d. Presently the plan **REJECTS THE LEASE**. If the lease is not assumed, the automatic stay and co-debtor stay will terminate at the conclusion of the confirmation hearing in accordance with 11 U.S.C. 365(p)(3).

/s/ John R. Morton, Jr.  
John R. Morton, Jr., attorney  
for Ford Motor Credit Company  
LLC

Dated: 8-21-19